

# EXHIBIT BB

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

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SNMP RESEARCH, INC. and SNMP	:	Case No. 3:20-cv-00451-JRG-DCP
RESEARCH INTERNATIONAL, INC.,	:	
Plaintiffs,	:	<b>EXTREME NETWORKS, INC.'S</b>
v.	:	<b>TENTH SUPPLEMENTAL RE-</b>
EXTREME NETWORKS, INC.,	:	<b>SPONSES AND OBJECTIONS TO</b>
Defendant.	:	<b>SNMP RESEARCH, INC.'S FIRST</b>
	:	<b>SET OF INTERROGATORIES TO</b>
	:	<b>EXTREME NETWORKS, INC.</b>
	:	
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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Extreme Networks, Inc. ("Extreme"), by and through its undersigned counsel, hereby supplements its Responses and Objections to SNMP Research, Inc.'s (together with SNMP Research International, Inc., "SNMPR" or "Plaintiffs") First Set of Interrogatories to Extreme Networks, Inc., dated December 26, 2020 (the "Interrogatories") as follows:

Subject to and without waiving the foregoing objections, Extreme responds as follows:

Pursuant to Federal Rule of Civil Procedure 33(d), Extreme identifies the following business records concerning profitability related to Product[s] Identified in response to Interrogatory numbers 1 and 2: EXTREME-00006169; EXTREME-00006652; EXTREME-00007033; EXTREME-00007582; EXTREME-00660537; EXTREME-00722216; EXTREME-00722258; EXTREME-00715815; EXTREME-00716449; EXTREME-00716456; EXTREME-00716601; EXTREME-00716621; EXTREME-00716762; EXTREME-00716805; EXTREME-00716824; EXTREME-00871500; EXTREME-01290742; EXTREME-01290743; and EXTREME-01290744.

For each Product Identified in response to Interrogatory numbers 1 and 2, Extreme identifies the number of Products shipped, revenue and costs, by quarter, from date of first sale through end of Extreme's Financial Year 2023 (June 30, 2023) with reference to Appendices E, F, and G (that are attached to this response,) as if they are incorporated herein.

Fact discovery is ongoing and expert discovery has not yet commenced. Extreme reserves the right to supplement its production and its response to this Interrogatory in the event Extreme produces additional documents or identifies additional information relevant to its response.

**INTERROGATORY NO. 8:**

Identify all internal Communications in which there was any discussion or Communication whatsoever concerning: (1) whether Extreme had a right to use SNMP Research Software in Extreme Products, including but not limited to any particular Extreme Product; and (2) payment obligations of Extreme for the use of SNMP Research Software.

**TENTH SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:**

Extreme objects to the interrogatory for using the phrase "any discussion or Communication" as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it seeks oral internal communications. Extreme will only identify written

internal communications. Extreme objects to this interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it asks for “all internal Communications,” which includes each and every responsive communication. Extreme will identify inclusive emails— emails with no replies or forwards, or the last email in an email thread—that have unique content not included in any other email. Extreme will not separately identify non-inclusive emails, which are emails whose text and attachments are fully contained in other emails. Extreme objects to the interrogatory to the extent it calls for information subject to a claim of privilege, including attorney-client privilege or attorney-work product doctrine. The interrogatory does not require Extreme to identify specific entries from its privilege log in response to this interrogatory. Based on its meet and confer discussions with SNMPR, Extreme has agreed to identify privilege log entries related to this interrogatory. By identifying privilege log entries here, Extreme does not agree to identify privilege log entries in response to other interrogatories where the interrogatory does not expressly call for identifying privilege log entries or waive its right to object to SNMPR’s demands for identifying privilege log entries. Subject to and without waiving these objections, Extreme responds as follows:

Extreme identifies the following internal communications that relate to this interrogatory: EXTREME-00604429; EXTREME-00604435; EXTREME-00604074; EXTREME-00604079; EXTREME-00693712; EXTREME-00698702; EXTREME-00691755; EXTREME-00708068; EXTREME-00708431; EXTREME-00693624; EXTREME-00504229; EXTREME-00527420; EXTREME-00681455; EXTREME-00687798; EXTREME-00604752; EXTREME-00704787; EXTREME-01089527; EXTREME-01101277; EXTREME-01086121; EXTREME-01105862; EXTREME-01105906; EXTREME-01105916; EXTREME-01105933l; EXTREME-01096966; EXTREME-01096968; EXTREME-01105913; EXTREME-01282786; EXTREME-01282836; EXTREME-01282800; EXTREME-01282788.

Extreme identifies the following entries from privilege logs served in this case that relate to this interrogatory: 490, 491, 497, 507, 508, 509, 510, 511, 512, 517, 522, 523, 528, 551, 552, 553, 561, 562, 566, 569, 570, 573, 574, 582, 658, 663, 664, 665, 666, 667, 681, 701, 702, 703, 704, 731, 732, 734, 735, 736, 739, 740, 741, 743, 744, 745, 747, 748, 749, 751, 752, 753, 755, 756, 757, 774, 776, 787, 819, 820, 838, 839, 983, 984, 998, 1022, 1023, 1024, 1025, 1029, 1033, 1034, 1043, 1324, 1328, and 1329.

Fact discovery is ongoing and expert discovery has not yet commenced. Extreme reserves the right to supplement these responses in the event that additional information is identified.

Dated: September 8, 2023

/s/ John M. Neukom

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*Attorneys for Extreme Networks, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Extreme Networks Inc.'s Tenth Supplemental Responses and Objections to SNMP Research, Inc.'s First Set of Interrogatories was served via email on this 8th day of September 2023 upon counsel of record for Plaintiffs.

/s/ Sean Robertson

Sean Robertson